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Rachel Perillo

October 6, 2021

By ECF

Hon. Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Hicham Kabbaj
20 Cr.08 (RMB)

Dear Judge Berman:

I am the attorney for Hicham Kabbaj, the defendant in the above-named matter. This letter is respectfully submitted with the consent of the government, by AUSA Andrew Rohrbach, to request a thirty-day adjournment of sentencing, currently scheduled for October 25, 2021 at 9:30 a.m., along with a corresponding adjournment of the parties' deadlines to file sentencing submissions. The reason for this request is that we are still awaiting critical documents and records that are needed in preparation of Mr. Kabbaj's sentencing submission, including Mr. Kabbaj's own medical records, his wife's medical records, and updated letters from family members. Mr. Kabbaj recently contracted Covid-19 and this made us unable to meet with him for some time and further delayed our ability to obtain these necessary documents.

Although a sixty day adjournment would more sufficiently ensure our ability to obtain these materials, we currently seek a thirty day adjournment, and will ask for additional time at a later date if it becomes apparent that it is needed. As mentioned, the government consents to an adjournment of thirty days.

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If the Court has any questions regarding this application, please contact my office. The Court's time and attention to this matter is appreciated.

Respectfully submitted,

/s/

David Stern

cc: AUSA Ni Qian (by ECF)
AUSA Andrew Rohrbach (by ECF)

Sentence is adjourned to 12/1/21
at 9:00 am. Defense submission
is due 11/16/21. Government
submission is due 11/23/21.

SO ORDERED:

Date: 10/7/21


Richard M. Berman, U.S.D.J.